

**UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

ADRIAN GIL ROJAS,

Petitioner,

v.

FRANK VANEGAS, Facility Administrator for
El Valle Detention Center; MIGUEL
VERGARA, Acting Field Office Director, San
Antonio Field Office, United States Immigration
and Customs Enforcement; KRISTI NOEM,
Secretary of Homeland Security; PAMELA JO
BONDI, United States Attorney General, *in their
official capacities,*

Respondents.

Civil Action No.: 1:25-cv-00056

EXHIBITS IN SUPPORT OF PETITIONER'S REPLY

Exhibit A – Letter from Petitioner's Partner Zorvelys Villegas Soto

Exhibit B – Letter from Clinton County District Attorney Vivian Joo

EXHIBIT A

I, Zorvelys Villegas Soto, declare under penalty of perjury the following:

1. I am Adrian Gil Rojas's partner. We have been together for six years. We have a son together who is two and a half years old. We all resided together in New York City at the time Adrian was detained.
2. In the time I have known Adrian, he has never been arrested. He has never been involved with any gang. He is not a bad person. He is hard working, collaborative, very social, and friendly with everyone that he meets. He always helps people. If someone needs assistance, he offers it. When his boss was killed in 2023, he felt fearful but he did everything he could to help the police and he was a witness at the trial. The whole experience affected him negatively.
3. Our son is the love of his life. He is the most important thing to Adrian. They have a very loving relationship and Adrian is a great dad.
4. The day that Adrian was detained in January 2025, Adrian was at home alone with our son. He called me to return to the house because police were there. It took me around 20 or 25 minutes to get home. When I got there, Adrian was in handcuffs and our son was alone in a room with agents, crying.
5. It was very traumatic for our son. He still talks about how the police came, how they trapped his father. He asks every day when his dad will come home, especially at night. He feels scared when he sees police in the street.
6. Adrian's detention has been very hard for me too. He did so much for our family, he provided for us. I am not able to work regularly because I am watching our son. We are barely surviving. I recently had to go to the emergency room for abdominal pain.
7. I ask the court to liberate Adrian as soon as possible. Our son misses him so much. We really need Adrian to come home.

I, ZORVELYS JOSEFINA VILLEGAS SOTO, declare under penalty of perjury that the foregoing is true and correct.

Date: 3/10/2025

A handwritten signature in black ink, appearing to read 'Zorvelys Villegas Soto', written over a horizontal line.

Zorvelys Villegas Soto

EXHIBIT B



ANDREW J. WYLIE
District Attorney

OFFICE OF THE
CLINTON COUNTY
DISTRICT ATTORNEY
Clinton County Government Center
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Plattsburgh, New York 12901



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March 25, 2025

Re: Adrian Gil-Rojas

To Whom It May Concern:

I write this letter on behalf of Adrian Gil-Rojas who testified at trial against the defendant, Thomas Lance who was charged with Manslaughter in the Second Degree. The trial commenced on April 29, 2024. Mr. Gil-Rojas testified that he was employed by the victim and was present when the victim confronted the defendant regarding the use of his truck. The defendant responded by accelerating his truck at a high rate of speed and struck the victim. The truck dragged the victim for several feet before the victim slipped off and was run over by the dual back wheels on the driver's side, causing the victim's death. The defendant sped off and left the scene. This occurred at a rest stop in Plattsburgh, NY. Mr. Gil-Rojas immediately called 911 for help.

Mr. Gil-Rojas was a key eyewitness in this case. Prior to trial, Mr. Gil-Rojas expressed his concern that the defendant may retaliate against him for testifying but he still took the stand and told the jurors of the horrific event he witnessed that day. His testimony was essential in obtaining a conviction. The jury returned a guilty verdict and the defendant was thereafter sentenced to 20 years to life.

If you have any questions, please do not hesitate to contact me at (518) 565-4411.
Thank you for your time and consideration.

Very truly yours,

VIVIAN JOO
Assistant District Attorney